

EXHIBIT C

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Attorneys for Defendants Asha Media and Bhalla

UNITED STATES DISTRICT COURT FOR
THE CENTRAL DISTRICT OF CALIFORNIA

CHINA CENTRAL TELEVISION, a
China company, et al.

Plaintiffs,

v.

CREATE NEW TECHNOLOGY, (HK)
LIMITED, A Hong Kong Company, et
al.,

Defendants.

Case No. 2:15-cv-01869-MMM
Hon. Margaret M. Morrow

SUGGESTION OF THE FILING OF
ASSIGNMENT FOR THE BENEFIT OF CREDITORS

1
2 Defendant, ASHA MEDIA GROUP, INC., by and through its undersigned
3 attorney, hereby files the following Suggestion of the Filing of Assignment For
4 The Benefit of Creditors and says that:
5

6 1. The caption and number of the Assignment For the Benefit of
7 Creditors case is as follows.
8

9 IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT
10 IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
11 CIVIL DIVISION
12

13 In re:

14 ASHA MEDIA GROUP, INC.,
15

16 Assignor,
17

Case No. 2015CA-007919
18

19 to
20

21 ANDREA BAUMAN,
22

23 Assignee.
24

25
26 2. The Assignment was filed on August 28, 2015. See attached file-
27 stamped copy of Petition only as **Exhibit 1**.
28

1 3. Pursuant to Florida Statute Section 727.105, the filing of the
2 Assignment essentially operates as a stay with respect to certain proceedings.
3 Furthermore, the **exclusive** remedy of an unsecured creditor is to file a proof of
4 claim in the assignment for the benefit of creditors case. See, Hillsborough
5 County v. Lanier, 898 So2d141(Fla. 2d DCA 2005).
6
7

8 4. The filing of this Suggestion is not a waiver or consent by the
9 Assignor of any jurisdictional, venue or other related matters but is simply filed as
10 a courtesy to the Court and parties in interest so that notice of the Defendant's
11 Assignment for the Benefit of Creditors filing is provided.
12

13 Respectfully submitted this 28th day of August, 2015.
14

15 /s/ Mark G. Clark
16 Mark G. Clark (*Pro Hac Vice*)
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 Attorneys for Defendants Asha and Bhalla

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of August, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System.

/s/ Mark G. Clark
Mark G. Clark (*Pro Hac Vice*)
TRAVERSE LEGAL, PLC

Attorneys for Defendant Asha and Bhalla

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
CIVIL DIVISION

In re:

ASHA MEDIA GROUP, INC.,

Assignor,

to

ANDREA BAUMAN,

Assignee.

Case No. 15- 007919
Division

PETITION FOR ASSIGNMENT FOR BENEFIT OF CREDITORS

Andrea Bauman ("Assignee"), as Assignee of Asha Media Group, Inc. ("Assignor"), hereby petitions the Court to administer the attached Assignment for the Benefit of Creditors from Assignor to Assignee accordance with Chapter 727, Fla. Stat. (1997), and states the following in support thereof:

1. Assignee has filed this Petition under §727.104(2)(b), Fla. Stat. (1997).
2. This Court has jurisdiction over these proceedings, as Assignor's principal place of business is in Hillsborough County, Florida at c/o Suzy Tate, PA, 14502 N. Dale Mabry Highway, Suite 200, Tampa, FL 33618.
3. Assignee is located at PO Box 5530, Lakeland, Florida 33807.
4. Assignor has numerous creditors. It is unable to pay the amounts due to these creditors, and wishes to pay these creditors debts insofar as possible through the assignment of its assets for their benefit.
5. A copy of the Assignment, together with Schedules A and B, are attached hereto as **Composite Exhibit "A"** and are incorporated by reference herein.



6. Assignee requests that the Court fix an amount of the Assignee's bond to be filed with the Clerk of the Court upon appropriate motion.

7. Assignee shall provide notice to all parties in accordance with §727.111 Fla. Stat. (1997).

Dated this 28th day of August, 2015.

Respectfully submitted,

JOHNSON, POPE, BOKOR,
RUPPEL & BURNS, LLP

/s/ Angelina E. Lim

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